

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
VINCENT RAGONE,

Plaintiff,

-against-

AETNA LIFE INSURANCE COMPANY,

Defendant.
-----X

Civil Action No.: 13 CV 04604
(KPF)(KNF)

**DECLARATION OF
LINA M. CAMACHO**

**DOCUMENT
ELECTRONICALLY FILED**

Lina M. Camacho, pursuant to 28 U.S.C. §1746(2) declares under penalty of perjury the following:

1. I am currently employed by Aetna Life Insurance Company (“Aetna”) as a Senior Appeal Specialist in the Appeals Unit. I am fully familiar with Aetna’s procedures concerning the review of long-term disability (“LTD”) benefit claims. I was personally involved in the review of Vincent Ragone’s (“Ragone”) claim for continuing LTD benefits on administrative appeal, which included review of the applicable plan documents and the administrative record.

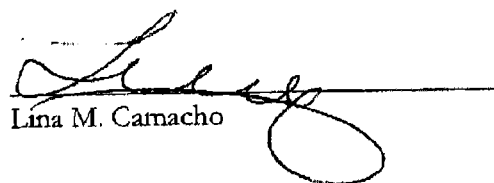
2. This Declaration is respectfully submitted in connection with Aetna’s Brief Regarding the Appropriate Standard of Review.

3. A true and correct copy of the Group Life and Accident and Health Insurance Policy for the Group Long Term Disability Plan (“LTD Plan”), the Group Life Insurance Plan (“Life Plan”) and the Group Accidental Death and Dismemberment Plan (“AD&D Plan”) for employees of Tradition (North America) Inc., effective October 1, 2005, identified by policy number GP-818699, Bates stamped RAGONE 000001 – 000154, is annexed hereto as **Exhibit “A.”**

4. A true and correct copy of the Master Application form, Bates stamped “RAGONE 002766-67,” which is the same as the one that would have been used by Tradition (North America) Inc. to apply for the Group Policy to fund benefits under its various employee welfare benefit plans, is annexed hereto as **Exhibit “B.”**

I declare under penalty of perjury that the foregoing is true and correct.

Dated: December 4, 2013


Lina M. Camacho

CERTIFICATE OF SERVICE

I, Matthew P. Mazzola, hereby certify and affirm that a true and correct copy of the attached **Declaration of Lina M. Camacho** was served via ECF and regular mail on December 4, 2013, upon the following:

Scott M. Riemer (SR5005)
RIEMER & ASSOCIATES LLC
60 East 42nd Street, Suite 1750
New York, New York 10165
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s/_____
Matthew P. Mazzola (MM 7747)

Dated: New York, New York
December 4, 2013